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Attorneys for Defendant,

BBVA Compass Insurance Agency, Inc.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JACK D. HARRISON AND NAOMA)
HARRISON,)

Plaintiffs,)

v.)

BANKERS STANDARD)
INSURANCE COMPANY, ACE)
PROPERTY AND CASUALTY)
INSURANCE COMPANY,)
AMERICAN FAMILY MUTUAL)
INSURANCE COMPANY AND)
BBVA COMPASS INSURANCE)
AGENCY, INC. AND DOES 1)
THROUGH 50)

Defendant.)

Case No.: 13 CV 1682 DMS JMA

**COMPASS'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO
PLAINTIFFS' SECOND
AMENDED COMPLAINT**

BBVA Compass Insurance Agency, Inc. ("Compass"), by its counsel,
hereby moves pursuant to Fed. R. Civ. P. 6(b) for an extension of time to
respond to Plaintiffs Jack and Naoma Harrison's ("Plaintiffs") Second Amended

1 Complaint, and in support of its Motion states as follows:

2 1. Compass's deadline to respond to the Second Amended Complaint
3 was on June 2, 2014.
4

5 2. On or about May 29, 2014, Plaintiffs extended Compass an
6 extension of time to respond to the Second Amended Complaint up to, and
7 including, June 11, 2014.
8

9 3. Compass has not waived any defenses it may assert, including any
10 jurisdictional and venue challenges.
11

12 4. This Motion was submitted in a timely fashion, and not for any
13 improper purpose.
14

15 5. No party will be unduly prejudiced by the granting of this Motion.

16 WHEREFORE, Compass requests that this Court extend the time allowed
17 for it to respond to Plaintiffs' Second Amended Complaint to June 11, 2014 and
18 that this Court provide such further and additional relief as it may deem just and
19 appropriate.
20
21

22 Respectfully submitted,

23 **MCGINNIS WUTSCHER BEIRAMEE LLP,**
24

25 Dated: June 4, 2014

/s/ Patrick J. Kane
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Certificate of Service

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing document and any related exhibits was served this **June 4, 2014**, by electronic mail on the following:

Attorney for Plaintiffs

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/s/ Patrick J. Kane
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